

**REMARKS**

Claims 1-10 are pending in the application; all claims were rejected under 35 U.S.C. §102(e) as being anticipated by Truong, U.S. Patent No. 6,151,609.

Applicant thanks the Examiner for pointing out the areas requiring correction 5 in the Application. Applicants have corrected the drawings, specification, and claim 1, and have provided discussion below for distinguishing the present invention from the art cited against it.

**DRAWINGS**

1. *The corrected drawings requested by the Examiner have been provided in 10 Appendix B of this response.*

Applicant has provided corrected drawings utilizing consistent lettering. Since Applicant has filed corrected drawings as requested by the Examiner, Applicant respectfully asks that the objection to the drawings be withdrawn.

**SPECIFICATION**

15 2. *The abstract has been provided on a separate page and complies with the requirements stated in MPEP §608.01(b).*

Applicant is unsure of which provision of MPEP §608.01(b) is objected to by the Examiner. A clean copy of the abstract with one extraneous inclusion removed has been provided on a separate page. The abstract is 58 words long, is in a single 20 paragraph, and does not contain legal phraseology. Thus, Applicant respectfully requests that this objection be withdrawn from the application.

In the event that this objection is maintained, Applicant requests that the Examiner indicate which specific aspect of the abstract is non-conforming.

3. *Applicant have amended claim 1 to indicate that "DP" stands for "data processing".*

Pursuant to the Examiner's suggestion, claim 1 has been clarified to remove an objected to acronym and replace it with its expanded meaning. Claim 1 has also  
5 been amended so that it is easier to read.

4. *The Russ, et al. reference is provided simply as background information and is thus not material to the patentability of the invention.*

Applicant discussed Russ, et al. in the Specification simply to provide the user with a cite to background information if further reading is required. The material  
10 it contains is not material to the patentability of the invention; according to MPEP §2001.05, "If information is not material, there is no duty to disclose the information to the Office."

Since Applicant asserts that Russ is not material to the invention, Applicant respectfully requests that this objection be withdrawn from the application.

15                   **35 U.S.C. §102(e), CLAIMS 1-10 ANTICIPATION BY TRUONG**

5. *The Truong reference discloses a system in which files stored on an Internet server can be edited with an Internet browser on a client, whereas the present invention is directed toward the use of an authoring system that has a format generator for generating a group of page files from an author file as well as  
20 data records of other files in the authoring system that are identified by reference.*

The present invention is directed to a method for generating a group of page files formatted in a page markup language such as HTML. The page files are generated on the basis of an author file editable in an authoring system into which references to data records of other data record-structured files of the authoring

system can be inserted. The author file is supplied to a format generator that generates a group of page files from the author file as well as from the data records of the other files identified by the references.

Inventively, the references to the data records of the other files addressable  
5 in the authoring system are converted into markup language-specific link control addresses (for example, HTML links) via which the pages files are linked on the server. In other words, the format generator of the present invention converts the reference structure established by the references of the files in the authoring system into a markup language-specific reference structure between the page files on the  
10 server that is realized via link control addresses. The group of page files referencing one another that is generated by the format generator is subsequently transmitted to the server. Truong does not disclose this.

The Truong reference, in contrast, is directed to a "remote editor system" in which files stored on an Internet server can be edited with an Internet browser  
15 running on a client. The underlying object in Truong thus already fundamentally differs from the object of the subject matter of the instant application. Accordingly, the features of the respective technical solutions in Truong and in the subject matter of the application also have an entirely different inter-relationship.

*6. Truong does not disclose an authoring system, format generator, or page  
20 markup language-specific link control address that addresses a page file.*

In Truong, an author file is definitely not produced on an authoring system (the authoring system of the present invention cannot be confused with the server of Truong), nor are the page files intended for the server automatically generated in an authoring system on this basis. Truong reveals no teaching or suggestion for a

format generator that generates a group of page files from the author file as well as from data records of other files of the authoring system that are identified by references. In particular, Truong yields no teaching of any kind to the effect that a page markup language-specific link control address that addresses a page file is  
5 respectively generated from reference information inserted into the data records.

The identification of the reference information in the subject matter of the application with a file name in Truong is untenable since the two terms have a completely different inter-relationship. Truong thus yields no teaching that a reference information (i.e. a file name) is inserted into a data record of the author file  
10 or of some other data record-structured file in order to generate a page markup language-specific link control address from this inserted file name using a format generator of the authoring system. Accordingly, Truong does not teach or suggest that the generated link control address addresses that page file on the server that is allocated to the file referenced by the reference information (i.e. by the file name) on  
15 the authoring system.

*7. Truong discloses editing the network editor web page that is identified by the input URL, and not the HTML file.*

The HTML file mentioned in column 7, lines 20-28 in Truong should not be confused with the file to be edited that is mentioned in column 3, lines 11-43 and in  
20 column 10, lines 15-35. The HTML file displayed by the browser after the input of the URL, on the contrary, is the network editor web page with which a graphic user interface is displayed for editing files. After the HTML file has been downloaded, the user must still define the file to be edited by clicking a radio button of the HTML file (column 9, lines 6-16 and Figure 4).

In Truong, thus, it is not the file to be edited but the network editor web page that is identified by the input URL. The file to be edited is identified by its file name on the server and transmitted from the server to the browser only after the selection of a radio button. A simultaneous interpretation of both the network editor web page  
5 and of the server file to be edited as author file is thus not consistent.

The files edited in the exemplary embodiments in Truong (see Figures 5 and 6 plus the appertaining text of the specification) are not HTML pages but, on the contrary, largely format-free shell scripts. The HTML keywords contained in the shell scripts are employed exclusively as parameters therein (for the 'echo' shell  
10 command). If the file to be edited were an HTML file, its HTML elements would interfere with the browser itself, and resulting in the file not being editable without further precautions (see column 10, lines 22-26 and Figure 3c, step 148).

Given these significant differences, Truong does not teach or suggest claim 1 of the present invention, nor any of the remaining dependent claims by virtue of their  
15 dependence.

*8. Additional elements of the present invention are not anticipated by dependent claims.*

In the present invention, claim 3 is directed to author-file-internal links, i.e., links within the author file that point to other data records of the same author file  
20 (claim 3: the data record-structured author file'). Such internal links in an author file to be produced are not disclosed in Truong.

Claim 4 is directed to a datafile addressable in the authoring system, whereas Truong et al. at 7/20-28 is directed to a datafile addressable on the server, i.e. not on the client.

Claim 6 of the present invention is directed to subdividing the information stored in the data record-structured files into information modules that are stored in a respective data record together with a respectively allocated structure address. For inserting a reference information referencing a data record of a reference file  
5 into a file, the structure addresses of the reference file are visualized in order to then select one of the structure addresses. Truong, In contrast, discloses no structure addresses stored in a data record together with an information module for selection purposes.

Claim 7 of the present invention is directed to a generation and storing of a  
10 page markup language-specific link control address when selecting a data record already stored in the server. In contrast, Truong does not trigger a generation of a URL by selecting a data record.

According to claim 9, a data record-structured file in the authoring system, i.e., not in the server, can only be addressed when the respectively allocated page  
15 files are already stored on the server. Furthermore, a page file is only transmitted from the authoring system to the server when it is not stored thereat or was modified. Such conditions for an addressing or, respectively, transmission are not disclosed in Truong.

Claim 10 is directed to a display of the page files with navigation files that  
20 allows scrolling between the page files without using a forward function inherent in the page access device (browser). Truong, in contrast, only discloses browser-inherent navigation fields (see Figures 4, 5, 6: back and forward buttons of the browser).

For all of these reasons, the Applicant asserts that the amended claim language clearly distinguishes over the prior art, and respectfully request that the Examiner withdraw the §102 rejection from the present application.

### CONCLUSION

5 Inasmuch as each of the objections have been overcome by the amendments, and all of the Examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be reconsidered, the rejections be withdrawn and that this application be passed to issue.

Respectfully submitted,

10

Mark Bergner (Reg. No. 45,877)

Mark Bergner  
SCHIFF HARDIN & WAITE  
PATENT DEPARTMENT  
6600 Sears Tower  
Chicago, Illinois 60606-6473  
(312) 258-5779  
Attorney for Applicants  
Customer Number 26574

15

20

### CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231 on January 22, 2003.

25

Mark Bergner  
Mark Bergner Attorney for Applicants